

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

**PROSPERITY HANDS, LLC, ELOISE
JONES and ROBERT JONES,**

Plaintiffs,

Case No. _____

v.

**State Court Case No:
15-CV-002463**

**STATE FARM FIRE AND
CASUALTY COMPANY,**

Defendant.

NOTICE OF REMOVAL

Defendant State Farm Fire and Casualty Company ("State Farm Fire") respectfully requests removal to the U.S. District Court for the Eastern District of Wisconsin, Milwaukee Division, pursuant to 28 U.S.C. § 1441 and § 1146. Diversity jurisdiction is present under 28 U.S.C. § 1332.

On March 23, 2015, plaintiffs, Prosperity Hands, LLC, Eloise Jones and Robert Jones, filed a complaint against State Farm Fire in Milwaukee County Circuit Court, Case No. 15-CV-002463, Prosperity Hands, LLC et al. v. State Farm Fire and Casualty Company. (See State Complaint which is attached). The Summons and Complaint in the state court action was first served on State Farm Fire on March 27, 2015. Therefore, this Notice of Removal is timely because it is filed within thirty (30) days of first service of

plaintiffs' Summons and Complaint and within one (1) year of the commencement of the action.

Plaintiff, Prosperity Hands, LLC is a limited liability company formed under the laws of the State of Wisconsin. The sole members of plaintiff, Prosperity Hands, LLC, are plaintiffs, Eloise Jones and Robert Jones. Eloise Jones and Robert Jones are each residents and citizens of the State of Wisconsin. Therefore, Prosperity Hands, LLC is a citizen of the State of Wisconsin. State Farm Fire is a citizen of the State of Illinois. Specifically, State Farm Fire is incorporated under the laws of the State of Illinois and has its principal place of business in Bloomington, Illinois.

Plaintiffs' state court complaint does not allege an amount in controversy but, based upon information provided by plaintiffs' counsel, the amount in controversy is greater than \$75,000 exclusive of attorney fees and costs. Accordingly, complete diversity of citizenship exists and removal is proper.

Dated this 24th day of April, 2015.

BOARDMAN & CLARK LLP
By

s/ Claude J. Covelli

Claude J. Covelli, SBN: 1014833

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Company

Casualty

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CERTIFICATE OF SERVICE

I hereby certify that on 4/24/15 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification electronically to all attorneys of record, and I mailed a copy of the same to Attorney Robert A. Levine via U.S. Mail.

s/Allison A. Miller

Allison A. Miller